

From: [Hennefeld, Daniel - SOL](#)
To: [Lillywhite, Jacob \(USANYS\)](#); [Stewart, Ryan C.](#); [Denerstein, Mylan L.](#); [Ahmad, Zainab](#)
Cc: [Boizelle, Ashley](#); [jschwartz](#); [Jaklevic, David M - SOL](#); [Kim, Elizabeth \(USANYS\)](#); [Gemmell, Kevin \(USANYS\)](#)
[\[Contractor\]](#); [Oestericher, Jeffrey \(USANYS\)](#); [Gitlin, Adam \(USANYS\)](#); [McArthur, Nikki](#); [Tarczynska, Dominika \(USANYS\)](#)
Subject: [EXTERNAL] RE: Amazon
Date: Friday, December 2, 2022 12:54:51 PM

I am writing to add a few things on behalf of DOL, supplementing Jake's email below, in response to Ryan's Nov. 30 email.

First, as Jake noted, we do appreciate your efforts to make progress on the outstanding issues so that we can complete and conclude the inspections. We hope that progress continues.

Second, please note that nearly all of the outstanding high-priority document requests discussed in the recent email exchange are responsive to OSHA's subpoenas as well as SDNY's, and are needed by OSHA for its inspections. In particular, this includes the ESI productions, which are responsive to a number of OSHA requests.

Third, to clarify, in the event that we are unable to successfully resolve the outstanding production issues, DOL would move jointly with SDNY to enforce the relevant OSHA subpoenas in the Southern District of NY, which of course is the location of one of the inspection sites. Again, we hope such action will be unnecessary provided we can continue the aforementioned progress toward resolution and completion.

Finally, I will respond separately today to your suggestion about tolling OSHA's statute of limitations.

Thanks.

- Dan

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Sent: Friday, December 2, 2022 12:24 AM
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